

# Gaming the Reading Experience

## Book-related Social Spaces for Young Children

Af Marianne Martens

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### Abstract

Sammenlignet med bøger for voksne, går det langsommere med at flytte fra print til digitale platforme når det gælder bøger og andet med kulturelt indhold for børn. Forskning indenfor bogindustrien viser dog, at det nu begynder at gå hurtigere (Howell & Henry, Nielsen Book, 2014). Børn og unge får flere og flere muligheder for at deltage i nye online tiltag, som vedrører bøger og litteratur. Fordi der i USA er love der siger, at børn skal være 13 år for at deltage i online sites, f.eks. the Child Online Privacy Protection Act (COPPA), fokuserer de fleste amerikanske literatursites på unge, som er 13 år eller ældre. Som noget nyt er der for nylig blevet dannet to nye amerikanske bogsites (eller literatursites), hvor brugerinvolveringen er rettet mod yngre børn: KidzVuz og Biblionasium. Disse sites kræver tilladelse fra enten forældre eller lærere, og på den måde overholder de loven. Dette muliggør yngre børns deltagelse, samtidig med at ejerne af websites'ene kan udnytte "børnearbejdet" omkring bøgerne. Børnenes involvering på sites'ene fungerer som peer-to-peer marketing, og især KidzVuz introducerer børn for forskellige varemærker. Her kan børn fra 7-12 lave videoer, finde venner, og melde sig ind i fanklubber, samt skrive boganmeldelser og anmeldelser for andre medier og andet der interesserer dem, som for

eksempel tv og film, spil, kæledyr og konkurrencer. Der bruges gamification på sitet, hvilket betyder at, børnene ligesom i computerspil belønnes med badges for det arbejde, de udfører. Branding på sitet er et fokus som giver "en unik og målrettet mulighed for at eksponere børn for varemærker via peer-to-peer marketing gennem deres egne bekendskaber" (KidzVuz, 2014). Biblionasium er et site hvor børn mellem 6 og 13 år kan skrive anmeldelser. Sitet samler data omkring hvad børnene læser og sender feedback til kontoejerne, altså enten forældrene eller læreren. Sitet har stor fokus på undervisning, og hævder at være "dedikeret til børn og deres læsning." Sitet bruger læsbarhedsindex i forhold til "The Lexile Framework" til at vurdere børnenes læseniveau.

Begge sites forsøger at få børn til at deltage i læsning via sociale medier, men i det koncept ligger en hårfin balance mellem kommercialisering og altruisme, især fordi disse sites fokuserer på unge under 13 år. Denne artikel undersøger hvordan børn og unge i højere og højere grad bruges til at arbejde med online litteratur på måder som er involverende, sjove - og lige på kanten af loven. Europæisk lovgivning omkring unges deltagelse på online sites vil blive brugt til sammenligning.

### Introduction

Dr. Eliza Dresang's (2005) Radical Change Theory which refers to the interactivity, connectivity and access in what she called "digital age" books for young people continues as the Internet enables ever advanc-

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ing digital technologies within literary production for young people. Epitextual elements around books for young people mean that digital age books must be understood across multiple stages beyond the books themselves: 1) how they are produced; 2) how they are marketed and disseminated; and 3) how they are consumed within an extensive peer-to-peer network. This paper examines specifically how books are marketed and disseminated across digital age channels that now target younger and younger readers.

Despite increasing changes enabled by technology, compared to books for adults, young people have been relatively slow to adopt books in digital formats. But industry research shows this move is beginning to accelerate (Howell and Henry, Nielsen Book, 2014). But whether or not they are actually reading books in digital formats, social media and other participatory venues provide new opportunities for how young people can engage with each other about books online, and as such, "reading is becoming more and more a fundamentally social act" (Ago-sto, 2012, p. 36). But what age is too young to participate? In the United States, laws such as the Child Online Privacy Protection Act (COPPA) restrict participation to children over thirteen, and until recently, book-related participatory fora for young people have primarily focused on attracting teenagers. Perhaps because of the success of such online communities for older readers, in which teens contribute reviews, peer-to-peer marketing, consumer research, and even content (Martens, 2009; Martens 2011; Martens 2012), new sites seek to reach younger readers in similar venues. Two recently established sites on which young people can review media including books are *KidzVuz* and *BiblioNasium*. These sites conform to COPPA by requiring parental or educator consent via third party moderators, which allow younger readers broader opportunities to participate, while simultaneously benefitting from children's affective labor around books, as they promote books to peers, and especially in the case of *Kidzvuz*, connect with brands. On *Kidzvuz*, children aged 7-12 can make videos, connect with "friends," and join fan clubs as they review books and other items across media and interests, including television, movies, games, pets, and contests. *BiblioNasium* is a book-reviewing site for six to thirteen-year-olds. Overtly educational in scope, the site claims to be: "dedicated not only to encouraging your child to read, but also

to making him or her a better reader" (*BiblioNasium*, 2014).

While both *KidzVuz* and *BiblioNasium* strive to get younger children excited about books by getting them to participate socially in reading, there is a delicate balance between commercialism and altruism at play, particularly as participatory sites around reading set their sights on those younger than thirteen. This paper will examine how online labor around books is increasingly being recruited from younger children in ways that are engaging and fun, while they push the limits of the law.

### **Background and Context for This Study**

This article builds on the author's previous work around online reading communities for young people. Book-related participatory sites for young people have existed since approximately 2007, when several of the major transnational publishers created teen-focused sites, such as Random House's *RandomBuzzers*, or Little, Brown's *HipScouts* (Martens, 2012). The sites were effective ways for producers of content for young people to get consumer feedback as well as benefit from peer-to-peer reviewing and marketing. Martens (2009) examined the successful *TwilightSaga.com* (Hachette, n.d.) site around the best-selling *Twilight* series by Stephenie Meyer. This site, which served as the official site where teens and women could participate in their *Twilight* fandom, from connecting with the author via Q&A sessions, to getting news about the latest *Twilight* products, still had 500,602 members as of September 3, 2014. Most importantly, beyond the content shared by *Twilight*'s publisher, author, and film company, readers connected with each other via various interest groups on the site, sharing user-generated content that centered around the *Twilight* series, to forming friendships, as on *Twilight*'s *OlderWoman Group* (Martens, 2015, forthcoming).

Because of the Child Online Privacy Protection Act (COPPA), which governs how young children are targeted online by advertisers and marketers in the United States, earlier studies have focused on online communities for young readers aged thirteen and up. The top American publishers all have online participatory sites for readers older than thirteen, but because of COPPA, their reach has been limited when it comes to young people under thirteen.

Publisher-owned sites like Random Buzzers, which existed from about 2007 until its recent change to a site called Figment (Figment, 2014), solicited teens' peer-to-peer reviews and marketing. Teens would get free Advanced Review Copies (ARCs) in exchange for posting their reviews within the site. The immaterial and affective labor (Terranova, 2000) contributed by teens on such sites is valuable to publishers as a rich form of peer-to-peer marketing, focus group interviews, and even user-generated content. In her (2004) book *Born to Buy*, Juliet B. Schor defines this phenomenon of children serving as marketers as "the New Child Labor" in which children are commodified experts, highly sought by marketers and producers for their feedback about existing products, and ideas for new products.

As described in Martens, 2011, *The Amanda Project* book series took teen participation a step further by encouraging teens over the age of thirteen to write their own continuation stories and post them on the publisher's book-affiliated website. If these continuation stories were deemed acceptable, they would be included in future books in the series. The series eventually failed, despite teens' extensive online contributions, possibly because the creators of the series neglected to pay attention to privacy issues. Because the Child Online Privacy Protection Act of 1998 (COPPA), which in the United States requires young people to be thirteen in order to participate, (without discussing the overall quality of the series), COPPA laws were perhaps at least partially responsible for the failure of *The Amanda Project*, a book series appealing to girls under thirteen, had to be marketed and sold to users over thirteen because of the book's online participatory companion website. As a book project with more "tween" appeal than "teen" appeal, *The Amanda Project* represented the collision of content, participants, and the law, as many readers described themselves as being under thirteen. Activities on the companion website paralleled the types of sites for older readers, in which the publisher asked readers to contribute storylines which could be used in future books in the series, engage in peer-to-peer marketing, shopping, and discussions in fan communities, including contributing content, were more (legally) appropriate for those over the age of thirteen.

First this article will examine evolving legal issues around creating participatory websites for readers younger than thirteen. Next, case studies of two such

sites, which target younger audiences will be studied, in order to understand how they are able to legally focus on tweens.

### **The Child Online Privacy Protection Act (COPPA)**

In the United States, the Child Online Privacy Protection Act of 1998 (COPPA) governs the use of websites for young people under the age of thirteen. While the law focuses on those sites designed specifically for children, sites intended for a general audience that would have child-interest must also comply. The goal of COPPA is to protect children's privacy and safety online, primarily by restricting how websites market to children.

According to the Federal Trade Commission (FTC), websites that target children are defined as those which include subject matter, visual, or audio content that would appeal to young people, such as animated characters, images of children, or celebrities that appeal to kids, and activities or incentives that appeal to young people, demonstrating that the site seeks to attract a young audience (Complying with COPPA, n.d.). Both of the sites described in this paper, *Kidzvuz* and *BiblioNasium* fit the criteria of sites that target and appeal to children.

### **International implications**

According to Michael L. Rustad (2013), there are international implications as well. "The Internet is interconnected and transnational, challenging traditional sovereignty based upon geographic borders," (p. iii) which means that all websites could in theory be sued in United States courts if they "infringe the rights of U.S. users" (p. iii). As technology changes, it becomes important for laws to evolve as well. According to the *Kidzvuz* site, as of July 2013, COPPA laws have expanded their definition of what constitutes children's personal information to include: "persistent identifiers such as cookies that track a child's activity online, as well as geolocation information, photos, videos, and audio recordings" (*KidzVuz*, Privacy Policy, 2014).

COPPA "makes it illegal for companies to harvest personally identifiable information from children aged thirteen and under without their parent's consent" (Rustad, 2013, p. 155). Rustad further sum-

marizes the FTC's definition of "personal information" as including first and last name of individual, physical address, email address or other contact information, phone number, Social Security number, a persistent identifier, and "any other information concerning the child or the parents of that child the operator collects online from the child" (Rustad, 2013, p. 157).

In order for children to participate in sites such as *KidzVuz*, they must have consent from a parent (or legal guardian). But collecting such consent is difficult, and on sites such as Facebook, it is relatively easy for young people to create profiles with or without parental consent, merely by claiming to be thirteen. New tools, regulated in the United States by the FTC, have made it easier for those wishing to create participatory sites for young people to get actual parental approval.

One such tool is the kidSafe seal program, described as a "safe harbor program," (FTC Approves, 2014) and sites that agree to conform to these guidelines are able to display the seal on their site, indicating to parents, care-givers and educators that a site is "safe" for children under thirteen to use. Verifiable parental consent, or "knowledge-based identification" . . .

"... is a way to verify the identity of a user by asking a series of challenge questions, typically that rely on so-called "out-of-wallet" information; that is, information that cannot be determined by looking at an individual's wallet and are difficult for someone other than the individual to answer. This authentication method has been used by financial institutions and credit bureaus for a number of years, and has been acknowledged by the Commission and other government agencies as effective for that purpose" (FTC, Verifiable, 2013).

In order to comply with COPPA laws, for children who wish to participate in *KidzVuz*, parents are required to provide a significant amount of personal information confirming their identity to a third-party service. Such information could include the last four digits of the parent or guardian's Social Security Number or a photo of a valid United States Driver's License, both of which are frequent resources for identity thieves. In return for its stringent verification process, *KidzVuz* is able to post the "kidSAFE" seal on the site. According to the kidSAFE site, the

seal program is a new, fast-growing "seal of approval" program that independently reviews and certifies the safety practices of child-friendly websites and technologies, including kid-targeted game sites, educational sites, virtual worlds, social networks, mobile apps, tablet devices, and other similar online and interactive products. "Products that meet our safety standards are added to the distinguished list of kidSAFE-certified products ... and are awarded the prestigious kidSAFE Seal for display on their website or technology" (Samet Privacy, 2011). Once parents or guardians have given approval for their children to participate, the *KidzVuz* Terms of Use applies to content posted.

### Terms of Use

*KidzVuz'* Uploading Agreement governs the rights to any content posted in their site. Participants younger than 18 must have parental consent. *KidzVuz* also specifies the type of content which may or may not be uploaded into the site. Examples of content that may not be uploaded, refers to products or services unsuitable for children between 7 and 12, and include "prescription medications, firearms, alcohol, tobacco, contraceptives and other products reserved for use by adults" (*KidzVuz* Uploading Agreement, 2013).

In order to comply with COPPA laws, The Federal Trade Commission allows websites to apply for self-regulatory guidelines that include safety protections and controls on information shared, including chat and interactive features. In order to apply, sites must comply with a set of eleven rules including some of the following:

"the site must post rules and have procedures for handling safety issues; must have age appropriate content and give parents much control over child's activities online; and give parents access to child's personal information. In addition, sites must obtain verifiable consent from a parent" (kidSAFE Seal Program, 2014).

With new safe harbor programs, online sites for young people are able to work within the framework of laws such as COPPA, and venture into new territories targeting younger audiences. In addition to the kidSAFE Seal Program, *KidzVuz* earns additional

parental support by seeking "ESRN [Entertainment Software Rating Board] Privacy Certification."

The *BiblioNasium* site also uses a safe harbor feature much like *KidzVuz* in order to comply with COPPA. In their case, such safe harbor program is the PRIVO's PRIVO-Cert™ Safe Harbor Certification Program ("the Program"). Like kidSAFE, PRIVO "is an independent, third-party organization committed to safeguarding children's personal information collected online" (*BiblioNasium*, Privacy, 2014), and posting the PRIVO certification seal on their site means that *BiblioNasium* has "established COPPA compliant privacy practices and has agreed to submit to PRIVO's oversight and consumer dispute resolution process" (*BiblioNasium*, Privacy, 2014).

So far, this article has explored legal issues around participatory, online, reading-related sites for young children, and studied privacy policies of two digital-age participatory, reading-related sites for young people under the age of thirteen. Next, *BiblioNasium* and *KidzVuz* will be examined closer to see how they manage to attract a younger participatory base, while operating within the law.

### Case Study #1: *BiblioNasium*

#### *About BiblioNasium*

Marjan Ghara founded *BiblioNasium* (Ghara, *BiblioNasium*, 2014) in 2011 out of a desire to first help her own daughters find good books, and then make sure they read them (Greenfield, 2013). At the time of this writing, *BiblioNasium* was a non-profit site that concentrates on engaging members to read and review books by connecting them with their peers and by building a community of readers.

*BiblioNasium* collects data on what students read and provides feedback to account holders (parents or educators). It also assesses children's reading levels using the Lexile framework. A Lexile reader measure is a metric used to assign reading levels to books based on semantic and syntactic content within books (Lexile, 2015), and ranges between emergent reader levels of "200L" and level "1600L" for advanced readers. By pairing a student's reading ability with the Lexile level of a book, books at appropriate reading levels can be assigned and/or recommended to students. The Lexile measure is used widely in

schools in North America, and while perhaps a practical tool, it is much criticized for boxing students in at a particular level, and not encouraging them to stretch beyond their current ability.



Figure 1. *BiblioNasium*'s Biblio-Board. Source: <https://BiblioNasium.com/>. Image used with permission of *BiblioNasium*

Compared to *KidzVuz*, which will be discussed next, *BiblioNasium* operates as a closed universe. Participants under thirteen are granted access via parents, guardians, or educators who must join on their behalf. As of August 18, 2015, the site claimed to have 226,668 kids registered across 33 nations (only US users qualify for prizes), with 1,742,983 books shelved (*BiblioNasium*, biblio-board, 2015).

#### *What Children Can Do On the BiblioNasium Site*

Modeled after Goodreads (Goodreads, 2014) on *BiblioNasium*, children can build their own bookshelves, and add books they are reading, have read, or want to read. Teachers can create shelves for their students, add required readings, and assess students' work via their reading logs, give feedback in the comments section, and assign reflection papers. *BiblioNasium* appears to be a teacher-driven site, focused on engaging students by reading and reviewing books within a community of peers.

The site is in part appealing to children because of the gamification on the site, which is used as a motivating strategy for readers. Gamification is the "idea of using game design elements in non-game contexts to motivate and increase user activity and retention" (Deterding, Dixon, Khaled, & Nacke, 2014). Gamified elements on *BiblioNasium* motivate reluctant students to read, including the opportunity to create an avatar, and the chance to participate in reading challenges which allow them to qualify for virtual badges and level up. In 2014, by logging in five times per week, participants were able to enter



weekly prize drawings. The June 1st, 2014 winner was John R., who won a \$15 Amazon gift card in exchange for logging in five times a week (and theoretically, reading). On September 1st, 2014, the prize-winner was Garrett G, who won a \$10 Amazon Gift Card.

Badges are earned by reading different genres. For example, a mystery badge features a colorful question mark, and red and gold badges are earned for reading multiple copies. Students win or earn badges by logging the amount of time (or pages) they've read, posting reviews and commenting on peer reviews. In addition to the teacher Reading Shelf, students can create their own shelf and add books they've finished, want to read or are currently reading. The logs raise questions: Who monitors the reading logs? How honest are the students? Are they reporting what they've read, or are they entering items in order to win prizes? Before students participate they are asked to sign the *BiblioNasium* Honor Code where they pledge to be honest, respectful of others and exercise safety.

#### *BiblioNasium's Accolades*

*BiblioNasium* has posted some of its accolades (including winning two awards) on the site, which also serve to give it credibility and respectability within the teaching community. *BiblioNasium* has won the American Association of School Librarians (AASL) Best Websites 2013 for Teaching & Learning Award

and the Milliken-Penn GSE Erudient Prize for Innovation in Borderless Education. In addition, tweets from influential educators describing how they use the site with their students are included as evidence, such as one from John Schuhmacher, a K-5 librarian, 2014 Newbery Committee member, and a 2011 Library Journal Mover and Shaker (*Library Journal*, 2011).

#### *BiblioNasium's Sustainability Plan*

As of 2014, *BiblioNasium* was non-profit, but according to Ghara: "We currently can monetize through the sale of books, either print or ebooks," (Greenfield, 2013). In addition, "We also have started our sponsorship opportunities and expect to grow that quickly. Also plans for a premium service is in the pipeline" (Greenfield, 2013). As has happened with review sites for older readers, that have either fallen apart or have been taken down as a site loses its popularity or changes its format, it is important to consider what future efforts to "monetize" the site might mean to those who have already contributed, and whether their reviews or bookshelves will continue to be accessible if they are unable to pay premium rates.

#### **Case Study #2: KidzVuz**

Compared to *BiblioNasium*, *KidzVuz* is a commercial site, which includes advertising for products from children's media to children's vegetables, as in

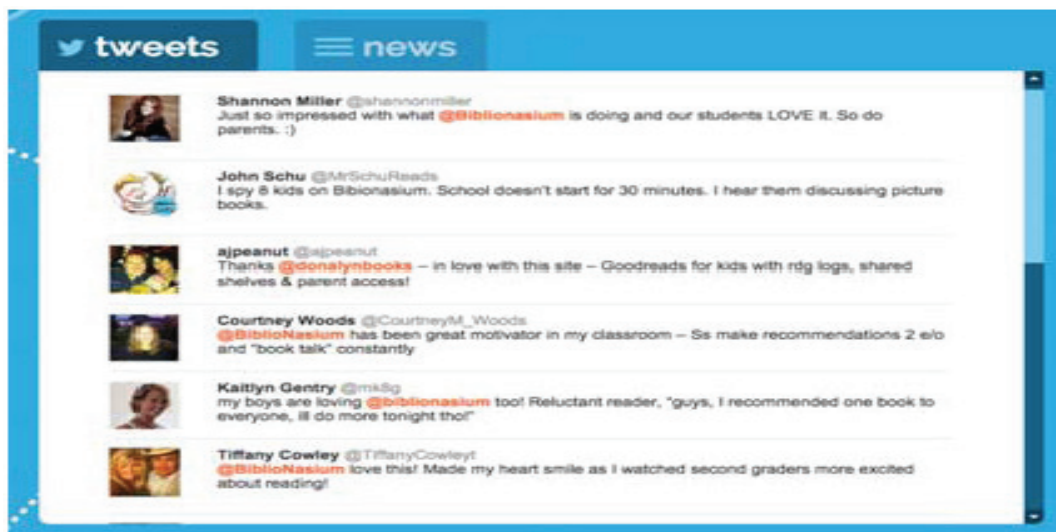


Figure 2. Sample Tweets posted on *BiblioNasium*. Source: <https://www.BiblioNasium.com/>. Image used with permission of *BiblioNasium*.

the Birds Eye sponsorship featured below. In this featured video, one of twenty-seven Birds Eye videos on the site "Kenzie8" provides her own personal advertisement for vegetables, showing how she has made a design on her plate that spells "KidzVuz" out of her Birds Eye vegetables.

*About KidzVuz*

When co-founder Rebecca Levey presented about *KidzVuz* at Digital Book World in New York in January, 2014, she highlighted the site's book-related content. The audience was a literary one, and she may have tailored her presentation accordingly. An in-depth examination of the site revealed evidence of more reviews of other media products than reviews about books. Arguably, the opportunity to participate socially in an online environment with other children is a strong draw. Like Marjan Ghara, Levey said she was a mom herself and that she created the site so that children could be "content creators," in a safe environment.

As on *BiblioNasium*, participants on *KidzVuz* are motivated to participate via gamification, and here, gamification allows participants to earn badges for their work. As on the *BiblioNasium* site, kids earn badges to impress teachers, parents, or their peers.

While children might be attracted to participate by the promise of agency: "You've got opinions! *KidzVuz* is here to let you have your say" (*KidzVuz*,

About, 2014), gamification might be a bigger draw. *Kidzvuz* uses gamification to encourage kids to read, and also to recommend. A Leaderboard posts the tally of each members' points based on their activity on the site, and, a "My Rewards" section shows all of the points and badges participants have earned. To earn badges and points members must watch other members' videos, review posted videos, share reviews with friends and parents who spread the word via Facebook/Twitter, and create review videos of the various media. In 2014, each time one of these initiatives was performed, members earned points as shown in Table 1 below:

Activity	Points Earned
Register to get your first badge!	+100pts
Watch the Film School Video	+50pts
Share videos by emailing to friends	+40pts
Submit your Own Video!	+25pts
Earn points just for watching videos all the way through!	+15pts
Leave a comment, earn points	+10pts

Table 1. Earning points on *KidzVuz*.

When searching for book reviews on the "Books & Magazines" tab of the site, there are reviews, but many are buried between participant's contest submissions. Several videos have a "sponsored by"

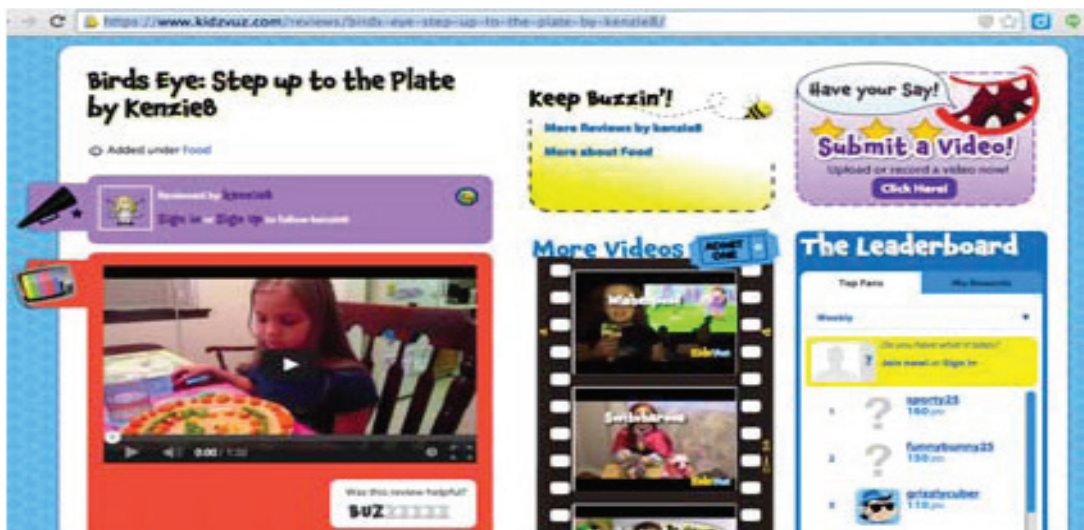


Figure 3: Sponsorship Example. Source: <https://www.kidzvuz.com/reviews/birds-eye-step-up-to-the-plate-by-kenzie8/> Image used with permission of KidzVuz.

page. Others are connected to contests. For example, a video post by thekinthinks called "Eddie Red Undercover Mystery on Museum Mile, by Marcia Wells, includes a note at the bottom that says:

"Hey Kids! Eddie Red Undercover: Mystery on Museum Mile is the new series by Marcia Wells. You can win a copy of the book and a \$100 gift card when you enter our contest at [www.kidzvuz.com](http://www.kidzvuz.com)". (*KidzVuz*, "Eddie", 2014) Retrieved from <https://www.kidzvuz.com/reviews/eddie-red-undercover-mystery-on-museum-mile-by-marcia-wells-2/>

### What Children Can Do on KidzVuz

On the *KidzVuz* site, children can post their reviews of technology, toys, movies, television, food, sports, travel destinations, pets, celebrities, fashion, and more. The site provides young people with tips on how to create a successful video review, and offers contests and badges as incentives for participation. Unlike *BiblioNasium's* closed universe, children's videos are freely available for viewing on *KidzVuz*. The site owners review the videos for appropriate content before making them live and offer parents the right to remove videos from the site even after videos are posted.

In between the reviews and the advertisements, *KidzVuz* also has features for parents. A "Parents'

Blog" includes categories like Parenting, Education, Health, Entertainment, Fashion, Food, Travel, Tech Product Revues, Gift Guides, Giveaways, and even an advice column called "Ask Selfish Mom" where children can ask questions they don't want to ask their own parents.

### *KidzVuz Sustainability Plan*

*KidzVuz* has a clear sustainability plan via its commercialized partnerships, advertising and sponsorship opportunities. Branding is a focus of the site, and the "Partner with Us" section presents: "... a unique and targeted opportunity for brands to reach kids through direct peer to peer relationships" (*KidzVuz*, Partner with Us, 2015).

How popular are these sites? Using Alexa Webanalytics, a free, online site that analyzes traffic on the Internet, the table below shows the overall popularity of *KidzVuz* and *BiblioNasium* compared to other sites.

While *BiblioNasium* and *KidzVuz* both claim to be growing their memberships, they are still far from similar sites, such as Goodreads.

### Discussion and Future Research

The case studies of this paper have shown the difference between two review-based sites for young

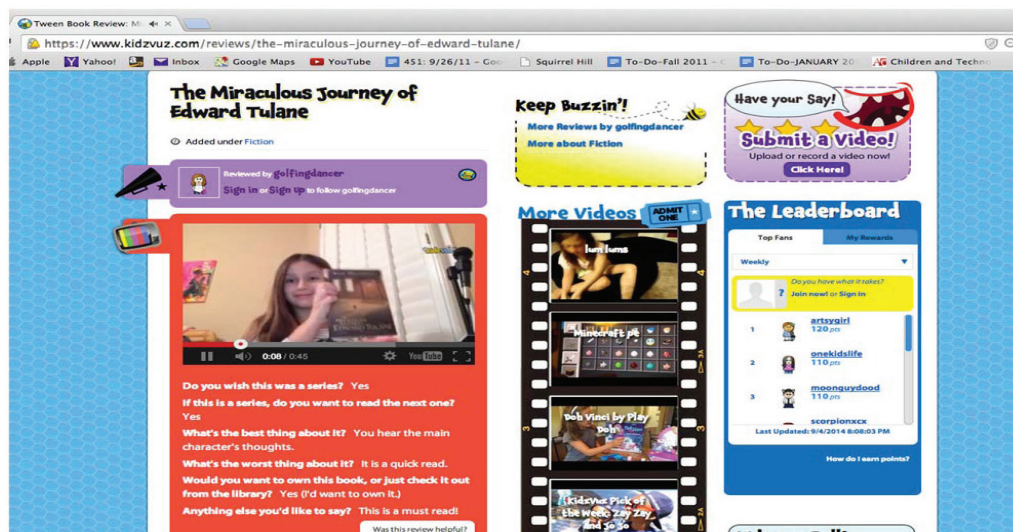


Figure 4. Video book review on KidzVuz. Source: <https://www.kidzvuz.com/reviews/the-miraculous-journey-of-edward-tulane/>. Image used with permission of KidzVuz.



Website	Global Rank 2014	Global Rank 2015	Rank in the United States 2014	Rank in the United States 2015
BiblioNasium	915,930	639,101	145,741	171,239
KidzVuz	255,836	824,834	73,046	156,884
Disney.com	902	1,649	259	478
Goodreads	281	278	138	130
Facebook	2	2	2	2
Google	1	1	1	1

Table 2. Alexa Rankings: Analysis of Sites Popularity. Source: Alexa.com.

children. One is a non-commercial site that has an educational focus, and a second, more commercial site, has a bigger focus on entertainment. Many questions emerge out of this study, including how to sustain a review site for young children (especially a non-commercial one) over time. Will it be possible for *BiblioNasium* to remain a non-profit site? How will their service change if the company becomes a for-profit company instead? What happens to children's contributions and their "bookshelves" in case participants are unable to pay for a premium service? A thorough analysis of *KidzVuz* should be conducted to see how much content is sponsored compared to what (if anything) is not sponsored. Are parents who sign their children up aware of the role their children will play as product testers and marketers? Is it possible to have a sustainable non-commercial site for young people that can protect privacy and online participation? And what is happening with sites like this in other countries?

## Conclusion

While one of the primary goals of the Child Online Privacy Protection Act (COPPA) is to protect children from marketing, an examination of the *KidzVuz* and *BiblioNasium* sites provided plenty of evidence of children participating in brands, especially on the *KidzVuz* site. Both review sites use safe harbor programs to get parental approval in order to reach children. At the moment, *BiblioNasium* operates as a not-for-profit site, while *KidzVuz* is clearly focused on profit. *KidzVuz* has figured out how to use safe harbor programs to comply with COPPA laws, and get parental approval to allow advertisers to reach their children. Parents and caregivers who give their consent to children's participation, may-or-may not

be aware to what extent this is occurring, and may think that participating in a review site is a way to give children agency. Much is to be learned here about who is participating. Why are adults willing to compromise their own privacy and provide consent for their children to participate in a site like *KidzVuz*? If the COPPA law is indeed about protecting children's privacy and restricting how children can be marketed to, in the case of *KidzVuz*, COPPA laws are turned on their heads as in the realm of digital age marketing, children become the marketers.

### *A Note on Methodology*

As site builders figure out ways of getting parental consent, participation is enabled for those under thirteen. This paper presents comparative case studies of two sites for tweens: *BiblioNasium* and *KidzVuz*, that provide opportunities for online participation around reading for children under the age of thirteen. Researcher analyzed both sites, collecting data via Excel, as themes emerged. The legal issues were studied on sites from the Child Online Privacy Protection Act (COPPA), to the Federal Trade Commission's site on "safe harbor" programs. Alexa webanalytics were used to compare the popularity of the sites, and researcher attended talks by founders of each site at the Digital Book World Conference in New York, in January 2014.

*NB: The idea for this paper started with a blog post for ALSC on 3/3/14: <http://www.alsc.ala.org/blog/2014/03/coppa-compliant-participatory-sites-for-young-readers/>*

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